

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

<p><u>IN RE TERRORIST ATTACKS ON</u> <u>SEPTEMBER 11, 2001</u></p> <p>Kwartowitz, Jan; Sorensen, William; Spence, Eric; Spencer, Maureen Staples, John; Staples, Maureen; Steele, Sandra; Stefanski, Richard, Jr.; Stevens, Tonya; Sullivan James; Sunshine, Joseph; Tagg, Gary; Tagg, Patricia; Tarrant, Cynthia; Tarrant, James; Taylor, William; Terry, Lenwood; Thorpe, David; Tine, Teresa; Torres, Carmen; Torres, Danny; Torres, Maricel; Torres, Milagros; Torres, Robert; Torres, Maria; Truell, Lawrence A.; Tse, Candie; Tucker, Marie; Tuthill, Lester; Twitty, Nigel; Twomey, Frances, as administrator of the Estate of Edward J. Twomey, deceased; Twomey, Frances individually; Tyson, Charmaine; Tyson, Jeannette; Greene, Leon; Vazquez, Dorothy; Vasquez, Israel; Vazquez, Juan; Vidal, Ramon; Vidal, Pascascia; Walker, Alanena, as administrator of the Estate of Renee D. Walker, deceased; Walker, Alanena, individually;</p>	<p>As relates to 03 MDL 1570 (GBD)(SN)</p> <p>Civil Docket Number:</p> <p>SHORT FORM COMPLAINT</p> <p>AND DEMAND FOR TRIAL BY JURY</p> <p>ECF CASE</p>
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Walsh, Delano;
Walsh, Audrey;
Washington, Ernest, Jr.;
Washington, Helen;
Watson, William;
Wells, Marc, as executor of the Estate of
Wells, Lawrence deceased
Wells, Marc individually;
White, Yvette, as administrator of the Estate
of Sheldon White, deceased;
White, Yvette individually
Williams, Barbara;
Williams, Eddie;
Williams, Ellen;
Williams, Elena R.;
Williams, Joya;
Wilson, Doris;
Worrell, Anthony;
Wright, Raymond;
Young, Collin;
Xu, Wei Quin, as administrator of the Estate
of Xiu Zhen, Chen, deceased;
Xu, Wei Quin, individually;
Zeller, Jerome;
Zeller, Esther;
Ziehl, Fred
Ziegler, Caroline;

PLAINTIFFS

V.

**KINGDOM OF SAUDI ARABIA; SAUDI
HIGH COMMISSION FOR RELIEF OF
BOSNIA & HERZEGOVINA**

DEFENDANTS

SHORT FORM COMPLAINT AND DEMAND FOR TRIAL BY JURY

Plaintiff(s) file(s) this *Short Form Complaint and Demand for Trial by Jury* against Defendants named herein by and through the undersigned counsel. Plaintiff(s) incorporate(s) by reference specific allegations, as indicated below, of Plaintiff's *Consolidated Amended Complaint* as to the Kingdom of Saudi Arabia ("Kingdom" or "Saudi Arabia") and the Saudi High Commission for Relief for Bosnia & Herzegovina ("the SHC") and *Demand for Jury Trial* in *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 in the United States District Court for the Southern District of New York (hereinafter "the CAC"). Plaintiff(s) file(s) this *Short Form Complaint and Demand for Jury Trial* as permitted and approved by the Court's Order of May 3, 2017, ECF No. 3543.

VENUE

1. Venue in this district is proper pursuant to 28 U.S.C. §§ 1391(b)(2) and 1391(f)(1), as a substantial part of the events giving rise to the claims asserted herein occurred in this district. Venue is also proper in this district pursuant to 18 U.S.C. § 2334(a).

JURISDICTION

1. Jurisdiction, is as asserted in the CAC, and further, jurisdiction within the *Short Form Complaint* is permitted upon and applicable to all defendants in this action:

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- ☒ 28 U.S.C. § 1605(a)(5) (non-commercial tort exception)
 - ☒ 28 U.S.C. § 1605B (Justice Against Sponsored Terrorism Act)
 - ☐ Other: (set forth below the basis of any additional ground for jurisdiction and plead such in sufficient detail as per the FRCP):
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CAUSE OF ACTION

3. Plaintiff(s) hereby adopts(s) and incorporate(s) by reference, the CAC as if set forth fully herein.
4. Furthermore, the following claims and allegations are asserted by Plaintiff(s) and are herein adopted by reference from the CAC:
 - ☒ Aiding and Abetting and Conspiring with al Qaeda to Commit the September 11th Attacks Upon the United States in Violation of 18 U.S.C. § 2333(d) (JASTA)
 - ☒ Aiding and Abetting and Conspiring with al Qaeda to Commit the September 11th Attacks Upon the United States in Violation of 18 U.S.C. § 2333(a)
 - ☒ Committing Acts of International Terrorism in Violation of 18 U.S.C. § 2333
 - ☒ Wrongful Death, as applicable to such a claim
 - ☒ Survival

- ☒ Alien Tort Claims
- ☒ Assault and Battery
- ☒ Conspiracy
- ☒ Aiding and Abetting
- ☒ Intentional Infliction of Emotional Distress
- ☒ Liability Pursuant to Restatement (Second) of Torts § 317 and
Restatement (Third) of Agency § 7.05: Supervising Employees and
Agents
- ☒ Liability Pursuant to Restatement (Second) of Torts § 317 and
Restatement (Third) of Agency § 7.05: Hiring Selecting, and Retaining
Employees and Agents
- ☒ 18 U.S.C. § 1962(a)-(d) – CIVIL RICO
- ☒ Trespass
- ☒ Putative Damages
- ☐ Plaintiff assert(s) the following additional theories and/or Causes
of Action against the Defendants: _____

IDENTIFICATION OF THE PLAINTIFFS

5. The following allegations and information contained herein, is allege as to each individual who is bringing this claim, as indicated on Appendix 1 to this *Short Form Complaint*, and/or as to each decedent who was injured and who is now deceased, whose claim is brought by the Estate represented, and as to the survivors of the Estate, herein referred to as “Plaintiffs.”

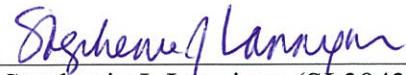
- a. The citizenship/nationality of said Plaintiff is indicated at Appendix 1 to this Short Form Complaint.
- b. Said Plaintiff is entitled to recover damages on the causes of action set forth in this Complaint.
- c. As indicated at Appendix 1, said Plaintiff was injured as a result of the terrorist attacks of September 11, 2001; is the estate representative of someone who was injured as a result of the terrorist attacks of September 11, 2001 and who is now deceased, or is a survivor of someone who was injured as a result of the terrorist attack of September 11, 2001 and who is now deceased.
- d. For those Plaintiffs with injury claims, as indicated in Appendix 1, on or after September 11, 2001, said Plaintiff was present at the Pentagon and/or the World Trade Center site and/or its surroundings and/or lower Manhattan and/or at any area wherein he/she was exposed to toxins as a result of the terrorist attacks and was exposed to toxins from the attacks, and/or was otherwise injured, and/or as otherwise alleged: _____.
- e. As a direct, proximate and foreseeable result of Defendants' action or inactions, Plaintiff suffered bodily injury and/or death, and consequently economic and other losses, including but not limited to pain suffering, emotional distress, psychological injuries, and loss of enjoyment of life, and otherwise described in the CAC, and/or otherwise may be specified in subsequent pleadings and/or discovery proceedings, and/or as otherwise alleged herein: _____.
- f. The name, relationship to the injured 9/11 victim, residency, citizenship/nationality, and the general nature of the claim for each Plaintiff is listed on the attached Appendix 1, and is incorporated herein as allegations,

JURY DEMAND

Plaintiff(s) hereby demand(s) a trial by jury as to the claims in this action.

Dated: December 31, 2018

Respectfully Submitted,



Stephenie J. Lannigan (SL3943)
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Stephenie J. Lannigan
sbross@yourlawyer.com
Counsel for Plaintiff(s)

with all allegations of the within *Short Form Complaint* deemed alleged as to each plaintiff.

IDENTIFICATION OF THE DEFENDANTS

6. The following entities are Defendants herein:

- ☒ Kingdom of Saudi Arabia
- ☐ Saudi High Commission for Relief of Bosnia & Herzegovina

Plaintiffs' constituent case, if applicable, and this *Short Form Complaint* shall be deemed subject to any motion to dismiss the CAC or Answer to the CAC filed by Saudi Arabia or the SHC. By way of filing this *Short Form Complaint*, plaintiffs shall not be deemed to have adopted any class-action allegations set forth in the CAC or waived any right to object to class certification or opt out of any certified class. This *Short Form Complaint* also does not serve as a request for exclusion from any class that the Court may certify.

WHEREFORE, Plaintiff(s) pray(s) for relief and judgment against Defendants as set forth in the CAC as appropriate.

Defendants:

KINGDOM OF SAUDI ARABIA

c/o Michael K. Kellogg, Esq.
Kellogg, Hansen, Todd, Figel & Frederick,
P.L.L.C.

Attorneys for Kingdom of Saudi Arabia

1615 M Street N.W. Suite 400

Washington, DC 20036-3215

Tel#: 202-326-7900

**SAUDI HIGH COMMISSION FOR RELIEF
OF BOSNIA AND HERZEGOVINA**

c/o Roy T. Englert, Jr., Esq.
Robbins, Russell, Englert, Orseck, Untereiner &
Sauber, LLP

*Attorneys for Saudi High Commission for Relief of
Bosnia & Herzegovina*

1801 K Street N.W. Suite 411L

Washington, DC 20006

Tel#: 202-775-4503

See Appendix 1 Annexed

APPENDIX 1 TO THE SHORT FORM COMPLAINT DATED MAY 22, 2018

Each line below is deemed an allegation, incorporating the allegations, language and references within the *Short Form Complaint* to which Appendix is appended, and shall be referenced as Allegation 1 of Appendix 1 to the *Short Form Complaint*, Allegation 2 of Appendix 1 to the *Short Form Complaint*, etc.

	Plaintiffs Name in Alphabetical Order of Last Name of Injured 9/11 Victim	Relationship to injured 9/11 victim	State of Residency at Filing	Citizenship/ Nationality on 9/11/2001	General Nature of the Claim Asserted
1	Kwartowitz, Jan	Self	NY	US	Personal Injury
2	Sorensen, William	Self	NY	US	Personal Injury
3	Spence, Eric	Self	NY	US	Personal Injury
4	Spencer, Maureen	Self	NY	US	Personal Injury
5	Staples, John	Self	NJ	US	Personal Injury
6	Staples, Maureen	Spouse	NJ	US	Loss of Consortium
7	Steele, Sandra	Self	NY	US	Personal Injury
8	Stefanski, Richard Jr.	Self	NY	US	Personal Injury
9	Stevens, Tonya	Self	NY	US	Personal Injury
10	Sullivan, James	Self	NJ	US	Personal Injury
11	Sunshine, Joseph	Self	NY	US	Personal Injury
12	Tagg, Gary	Self	OH	US	Personal Injury
13	Tagg, Patricia	Spouse	OH	US	Loss of Consortium
14	Tarrant, Cynthia	Self	NY	US	Personal Injury
15	Tarrant, James	Spouse	NY	US	Loss of Consortium
16	Taylor, William	Self	NY	US	Personal Injury
17	Terry, Lenwood	Self	NY	US	Personal Injury
18	Thorpe, David	Self	NY	US	Personal Injury
19	Tine, Teresa	Self	NY	US	Personal Injury
20	Torres, Carmen	Self	NY	US	Personal Injury
21	Torres, Danny	Self	NY	US	Personal Injury

22	Torres, Maricel	Spouse	NY	US	Loss of Consortium
23	Torres, Milagros	Self	NY	US	Personal Injury
24	Torres, Robert	Self	NY	US	Personal Injury
25	Torres, Maria	Spouse	NY	US	Loss of Consortium
26	Truell, Lawrence A.	Self	NY	US	Personal Injury
27	Tse, Candie	Self	NY	US	Personal Injury
28	Tucker, Marie	Self	NY	US	Personal Injury
29	Tuthill, Lester	Self	NY	US	Personal Injury
30	Twitty, Nigel	Self	NY	US	Personal Injury
31	Twomey, Frances as administrator of Estate of Twomey, Edward J., deceased	PR	NY	US	Wrongful Death
32	Twomey, Frances	Self	NY	US	Solatium
33	Tyson, Jeannette	Self	NY	US	Personal Injury
34	Greene, Leon	Spouse	NY	US	Loss of Consortium
35	Vazquez, Dorothy	Self	NY	US	Personal Injury
36	Vazquez, Israel	Self	NY	US	Personal Injury
37	Vazquez, Juan	Self	NY	US	Personal Injury
38	Vidal, Ramon	Self	NY	US	Personal Injury
39	Vidal Pascascia	Spouse	NY	US	Loss of Consortium
40	Walker, Alanena, as administrator of the Estate of Renee D. Walker, deceased	PR	NY	US	Wrongful Death
41	Walker, Alanena	Self	NY	US	Solatium
42	Walker, Denis	Self	NY	US	Personal Injury
43	Walker, Debra	Spouse	NY	US	Loss of Consortium
44	Walsh, Delano	Self	NY	US	Personal Injury

45	Walsh, Audrey	Spouse	NY	US	Loss of Consortium
46	Washington, Ernest, Jr.	Self	NY	US	Personal Injury
47	Washington, Helen	Self	NY	US	Personal Injury
48	Watson, William	Self	NJ	US	Personal Injury
49	Wells, Marc., as executor of Estate of Wells, Lawrence deceased	PR	NY	US	Wrongful Death
50	Wells, Marc	Self	NY	US	Solatium
51	White, Yvette, as administrator of the Estate of Sheldon White, deceased	PR	NY	US	Wrongful Death
52	White, Yvette	Self	NY	US	Solatium
53	Williams, Barbara	Self	NY	US	Personal Injury
54	Williams, Eddie	Self	NY	US	Personal Injury
55	Williams, Ellen	Spouse	NY	US	Loss of Consortium
56	Williams, Elena R.	Self	NY	US	Personal Injury
57	Williams, Joya	Self	NY	US	Personal Injury
58	Wilson, Doris	Self	NY	US	Personal Injury
59	Worrell, Anthony	Self	NJ	US	Personal Injury
60	Wright, Raymond	Self	NY	US	Personal Injury
61	Young, Collin	Self	NJ	US	Personal Injury
62	Xu, Wei Quin as administrator of the Estate of Xiu Zhen Chen deceased	PR	NY	US	Wrongful Death
63	Xu, Wei Quin	Self	NY	US	Solatium
64	Zeller, Jerome	Self, Spouse	NY	US	Personal Injury

65	Zeller, Esther	Spouse	NY	US	Loss of Consortium
66	Ziehl, Fred	Self	NY	US	Personal Injury
67	Ziegler, Caroline	Self	NY	US	Personal Injury